

**UNITED STATES DISCRIT COURT
SOUTHERN DISTRICT OF NEW YORK**

PROJECT VERITAS and PROJECT
VERITAS ACTION FUND,

Plaintiffs,

v.

JAMES O'KEEFE, TRANSPARENCY 1,
LLC d/b/a O'KEEFE MEDIA GROUP, RC
MAXWELL, and ANTHONY
IATROPOULOS,

Defendants.

Civil Action No. 7:23-cv-04533

MOTION TO COMPEL
ARBITRATION

**NOTICE OF FILING DEFENDANTS,
JAMES O'KEEFE AND O'KEEFE MEDIA GROUP'S,
MOTION TO COMPEL ARBITRATION AND STAY PROCEEDING**

COME NOW Defendants, JAMES O'KEEFE and TRANSPARENCY 1, LLC d/b/a O'KEEFE MEDIA GROUP ("O'Keefe" and "OMG", respectively, and "Defendants" collectively), pursuant to 9 U.S.C. §§ 3 and 4, and hereby respectfully file their notice of motion to move this Court for an order (i) compelling arbitration of all claims it deems arbitrable contained in the First Amended Complaint filed by Plaintiffs, PROJECT VERITAS and PROJECT VERITAS ACTION FUND ("Veritas" and "PVAF", respectively, and "Plaintiffs" collectively) on October 12, 2023; and (ii) staying this litigation until arbitration is complete.

Dated this 16th day of April 2024.



CHILDERS LAW, LLC

2135 NW 40th Terrace, Suite B
Gainesville, Florida 32605
tel. 866-996-6104 fax 407-209-3870

/s/ Seldon J. Childers

Seldon J. Childers

Florida Bar No. 61112

jchilders@smartbizlaw.com

notice@smartbizlaw.com

Counsel for Defendant

CERTIFICATE OF SERVICE

I hereby certify that I filed the foregoing document (including any attached exhibits and documents) electronically with the Clerk of the Court using CM/ECF on April 16, 2024 which served same electronically upon all counsel of record.

s/ Seldon J. Childers
Attorney